

ATTORNEYS AT LAW

NEW YORK • CALIFORNIA • LOUISIANA • ILLINOIS

TIMOTHY A. DELANGE
timothyd@blbgllaw.com
(858) 720-3186

December 2, 2015

VIA ECF & HAND DELIVERY

Honorable Richard M. Berman
U.S. District Court, Southern District of New York
Daniel Patrick Moynihan, United States Courthouse
500 Pearl Street, Courtroom 17B
New York, NY 10007-1312

Re: *Coordinated RMBS Trustee Actions Against Deutsche Bank National Trust Company, Deutsche Bank Trust Company Americas and Wells Fargo Bank, N.A.*,
Nos. 14-cv-9367; 14-cv-9764; 14-cv-10067; 14-cv-10102; 14-cv-9371

Dear Judge Berman:

On behalf of the parties in the above-referenced actions, we write jointly to inform the Court of the status of discovery and settlement discussions in advance of the Status Conference scheduled with the Court for Monday, December 7, 2015, at 10:00 a.m.

On September 25, 2015, the parties appeared at a Conference before Magistrate Judge Sarah Netburn to discuss the status of discovery and discovery deadlines. After review of the parties' joint submission and hearing oral presentations from counsel, Judge Netburn ordered as follows: (i) all document discovery – including all electronic discovery as well as discovery of documents within the parties' files or the files of third parties – be completed by April 29, 2016; and (ii) all fact discovery, including all depositions, be completed by October 31, 2016. Judge Netburn further ordered the parties to submit a joint letter by January 8, 2016, that shall: (i) inform the Court regarding the status of discovery, including any outstanding discovery disputes; and (ii) indicate the parties' willingness to participate in a settlement conference and, if so, provide proposed dates.



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I. Status of Discovery

Since the September 25, 2015 Conference with the Court, the parties have made progress in fact discovery, including serving and responding to written discovery requests, finalizing a Protective Order, exchanging proposed electronic search terms and custodians, producing or making available for inspection several million pages of hard copy and electronic documents in response to the parties' requests for production, pursuing third-party subpoenas for production of business records, and participating in meet and confer sessions in an attempt to resolve party and third-party discovery disputes without the Court's intervention. The parties have also served and responded to interrogatories and requests for admission.

II. Settlement Conference

In light of the current status of discovery, the parties agree that the scheduling of a settlement conference is premature at this time. In accordance with Judge Netburn's Order referenced above, the parties will provide a joint letter to Judge Netburn by January 8, 2016, indicating the parties' willingness to participate in a settlement conference and, if so, providing proposed dates.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Tim A. DeLange", with a long horizontal flourish extending to the right.

Timothy A. DeLange

cc: All Counsel of Record (via ECF)